

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes

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**APPELLANT’S DESIGNATION OF THE CONTENTS  
OF THE RECORD AND STATEMENT OF ISSUE ON APPEAL**

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Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), appellants Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (together, “Syncora”) file this designation of the contents of the record and statement of issue regarding Syncora’s July 3, 2014 notice of appeal [Doc. No. 5759], filed pursuant to Bankruptcy Rule 8001 and 28 U.S.C. § 158(a), from this Court’s final order, entered July 2, 2014, denying the motion of certain creditors to view or, in the alternative, unseal a supplemental order regarding mediation confidentiality.

**1. DESIGNATION OF THE CONTENTS OF THE RECORD ON APPEAL**

<b><u>Item #</u></b>	<b><u>Date</u></b>	<b><u>Docket Number</u></b>	<b><u>Document Title</u><sup>1</sup></b>
1	8/13/2013	322	Mediation Order

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<sup>1</sup> All documents include exhibits attached thereto.

<b><u>Item #</u></b>	<b><u>Date</u></b>	<b><u>Docket Number</u></b>	<b><u>Document Title</u><sup>1</sup></b>
2	8/20/2013	527	Amended Order to Certain Parties to Appeal for First Mediation Session
3	9/3/2013	704	Order Directing Additional Parties to Appeal for First Mediation Session
4	3/8/2014	3315	Notice of Subpoenas to Detroit Institute of Arts, Christie's Inc., and the State of Michigan Pursuant to Federal Rule of Civil Procedure 45(a)(4)
5	5/6/2014	4479	City of Detroit's Objections and Responses to Syncora Capital Assurance Inc. and Syncora Guarantee Inc.'s First Request for the Production of Documents
6	5/16/2014	4897	State of Michigan's Response to Syncora's Subpoena Dues Tecum
7	5/28/2014	5128	Transcript Order Form of Hearing on May 28, 2014
8	6/12/2014	5294	Supplemental Order Regarding Mediation Confidentiality (Filed Under Seal)
9	6/13/2014	5300	Joint Motion of Community Foundation for Southeast Michigan, William Davidson Foundation, The Fred A. and Barbara M. Erb Family Foundation, Max M. and Marjorie S. Fisher Foundation, Ford Foundation, Hudson-Webber Foundation, The Kresge Foundation, W.K. Kellogg Foundation, John S. and James L. Knight Foundation, McGregor Fund, Charles Stewart Mott Foundation and A. Paul and Carol C. Schaap Foundation to Quash Subpoenas Duces Tecum

<u>Item #</u>	<u>Date</u>	<u>Docket Number</u>	<u>Document Title</u> <sup>1</sup>
10	6/17/2014	5358	Motion of Creditors to View Or, in the Alternative, Unseal Supplemental Order Regarding Mediation Confidentiality

## 2. STATEMENT OF ISSUE ON APPEAL

Can the bankruptcy court *sua sponte* seal (and otherwise keep Syncora from viewing) a new order that (1) supplements an existing order *that binds Syncora* and (2) relates to an ongoing mediation (*to which Syncora is a party*) in the bankruptcy case?

Dated: July 17, 2014

/s/ Ryan Blaine Bennett

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